

# **THE BLANCH LAW FIRM** A Professional Corp.

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July 12, 2011

VIA ECF

Honorable Theodore H. Katz, United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: United States v. Chang, et. al.; 10-CR-00878-KWM-22

Your Honor:

Our firm is counsel of record for Paul Turpanjian, and we respectfully submit this request to seal the record of Mr. Turpanjian's deferred prosecution agreement. Sealing is particularly appropriate in this case because no criminal record will result for Mr. Turpanjian. We have spoken with Assistant United States Attorney Dan Goldman about this matter, and he has no objections.

If there are any questions of additional information needed, please do not hesitate to contact me. The Court's attention to this matter is greatly appreciated.

Respectfully submitted,

/s/ Edward J. McQuat  
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Cc: AUSA Dan Goldman, SDNY